

EXHIBIT 69

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 - - -

4 IN RE: JOHNSON & : MDL No.
5 JOHNSON TALCUM POWDER : 16-2738
6 PRODUCTS MARKETING, : (MAS) (RES)
7 SALES PRACTICES, AND :
8 PRODUCTS LIABILITY :
9 LITIGATION :
10 - - -

11 SUPERIOR COURT OF NEW JERSEY
12 LAW DIVISION, ATLANTIC COUNTY
13 - - -

14 IN RE: TALC-BASED : Consolidated
15 POWDER PRODUCTS : Docket No.
16 LITIGATION : ATL-L-2648-15
17 :
18 : MCL Case No.
19 : 300
20 - - -

21 January 10, 2024
22 - - -

23 Remote Oral Expert
24 deposition of JUDITH KAY WOLF, M.D.,
conducted at the location of the witness
in Austin, Texas, commencing at 10:15
a.m. Eastern, on the above date, before
Kimberly A. Cahill, a Federally Approved
Registered Merit Reporter, Certified
Court Reporter, and Notary Public.

25 - - -

26 GOLKOW TECHNOLOGIES, INC.
27 877.370.3377 ph| 917.591.5672
28 deps@golkow.com

Page 2			Page 4		
1	APPEARANCES:		1	August to December	
2			2	2023	
3	BEASLEY ALLEN		3	Curriculum Vitae of 116	
4	BY: P. LEIGH O'DELL, ESQUIRE		4	Judith K. Wolf, M.D.	
5	BY: MARGARET M. THOMPSON, ESQUIRE		5	Notice of Oral 119	
6	218 Commerce Street		6	Deposition of Judith E. Wolf	
7	Montgomery, Alabama 36104		7	M.D. and Duces Técum in MDL	
(334) 269-2343			8	Wolf-7 11/15/23 Second 124	
leigh.odell@beasleyallen.com			9	Amended Rule 26	
margaret.thompson@beasleyallen.com			10	General Expert Report of Judith Wolf, M.D.	
Representing the Plaintiffs			11	Wolf-8 11/15/23 Amended 125	
ASHCRAFT & GEREL			12	Rule 26 Bondurant Case-Specific Expert Report of Judith Wolf, M.D.	
BY: MICHELLE A. PARFITT, ESQUIRE			13	Wolf-9 11/15/23 Amended 127	
1825 K Street NW			14	Rule 26 Judkins Case-Specific Expert Report of Judith Wolf, M.D.	
Suite 700			15	Wolf-10 11/15/23 Amended 128	
Washington, D.C. 20006			16	Rule 26 Galardo Case-Specific Expert Report of Judith Wolf, M.D.	
(202) 335-2600			17	Wolf-11 "Effects of Risk 142	
Representing the Plaintiffs			18	Factors for ovarian cancer in women with and without endometriosis	
GOLOMB LEGAL			19	Paper by Phung, et al	
BY: RICHARD M. GOLOMB, ESQUIRE			20	Wolf-12 "Genital Powder Use 167	
1835 Market Street			21	and Risk of	
Suite 2900			22		
Philadelphia, Pennsylvania 19013			23		
(215) 985-9177			24		
Representing the Plaintiffs					
SHOOK, HARDY & BACON L.L.P.					
BY: MARK C. HEGARTY, ESQUIRE					
2555 Grand Boulevard					
Kansas City, Missouri 64108					
(816) 474-6550					
mhegarty@shb.com					
Representing the Defendants, Johnson & Johnson and Johnson & Johnson Consumer, Inc.					

1	-----		1	Epithelial Ovarian Cancer in the	
2	I N D E X		2	Ovarian Cancer in Women of African Ancestry Consortium" Paper by Davis, et al	
3	-----		3	Wolf-13 "Association 192	
4			4	Between the Frequent Use of Perineal Talcum Powder Products and Ovarian Cancer: a Systematic Review and Meta-analysis Paper by Woolen, et al	
5	Testimony of: JUDITH KAY WOLF, M.D.		5	Wolf-14 "Asbestos Exposure 206	
6	By Mr. Hegarty 25		6	and Ovarian Cancer: A Gynaecological	
7	By Ms. O'Dell 275		7	Occupational Disease, Background, Mandatory Notification, Practical Approach" Paper by Nowak, et al	
8	By Mr. Hegarty 285		8	Wolf-15 "The effect of talc 215	
9	-----		9	powders on phagocytes in co-culture with ovarian cancer cells" Paper by Mandarino, et al	
10	E X H I B I T S		10	Wolf-16 "Transcriptomic and 221	
11	-----		11	epigenomic effects of insoluble particles on J774 macrophages" Paper by Emi, et al	
12	NO.	DESCRIPTION	12	Wolf-17 "Talcum powder 236	
13		PAGE	13		
14	Wolf-1 Materials Considered List 71		14		
15	Attached as Exhibit B to the 11/15/23		15		
16	2nd Amended Export Report (General) of Judith Wolf, M.D.		16		
17			17		
18	Wolf-2 "Folder #2 General Causation Materials, Lynch Systematic Review Tables" 80		18		
19			19		
20			20		
21	Wolf-3 Thirty-four Pages of Judith Wolf Invoices Starting with January 2017 107		21		
22			22		
23	Wolf-4 Three Pages of Judith Wolf Invoices from 110		23		
24			24		

			Page 6	Page 8
1	induces malignant		1	- - -
2	transformation in		2	DEPOSITION SUPPORT INDEX
3	normal human		3	- - -
4	primary ovarian		4	
	epithelial cells			
	Paper by Harper, et			
	al			
5	Wolf-18 PLOS ONE Reviewer	236	5	Direction to Witness Not to Answer
6	Comments		6	Page Line Page Line Page Line
7	SAED SEPT222021_		7	
8	SUPPL_000100_			
	through			
	SAED SEPT222021_			
	SUPPL_000104_			
9	Wolf-19 Gynecologic	251	8	Request for Production of Documents
10	Oncology Reviewer		9	Page Line Page Line Page Line
11	Comments		10	114 6
12	SAED SEPT222021_		11	
	SUPPL_000069 and			
	SAED SEPT222021-			
	SUPPL_000070			
13	Wolf-20 General Report of	266	12	Stipulations
14	Dr. Wolf Present		13	Page Line Page Line Page Line
	with Witness		14	
15	Wolf-21 Judkins	267	15	
16	Case-Specific Report of Dr. Wolf		16	Question Marked
17	Present with Witness		17	Page Line Page Line Page Line
18	Wolf-22 Gallardo	268	18	
19	Case-Specific Report of Dr. Wolf		19	
20	Present with Witness		20	
21	Wolf-23 Bondurant	268	21	
22	Case-Specific Report of Dr. Wolf		22	
23	Present with Witness		23	
24	Wolf-24 Dr. Longo's	269	24	
			Page 7	Page 9
1	Exposure Report		1	- - -
2	Present with		2	THE COURT REPORTER: All
	Witness		3	parties to this deposition are
3	Wolf-25 Dr. Longo's MDL	269	4	appearing remotely and have agreed
4	Third Supplemental		5	to the witness being sworn in
5	Report Present with		6	remotely. Due to the nature of
6	Witness		7	remote reporting, please pause
7	Wolf-26 Dr. Levy's Report	269	8	briefly before speaking to ensure
8	Present with		9	all parties are heard completely.
9	Witness		10	Counsel, please state your
10	Wolf-27 Entirety of	270	11	appearances for the record.
11	Literature Dr. Wolf		12	MS. O'DELL: Leigh O'Dell
12	Brought to		13	from Beasley Allen for the
13	Deposition		14	plaintiffs.
14	Wolf-28 HHS Public Access	280	15	MS. THOMPSON: Margaret
15	"General powder use		16	Thompson from Beasley Allen.
16	and risk of		17	MS. PARFITT: Michelle
17	epithelial ovarian		18	Parfitt, Ashcraft & Gerel, for the
18	cancer in the		19	plaintiffs, MDL steering
19	Ovarian Cancer in		20	committee.
20	Women of African		21	MR. GOLOMB: Richard Golomb
21	Ancestry		22	from Golomb Legal for the
22	Consortium" Paper		23	plaintiffs.
23	by Davis, et al		24	MR. HEGARTY: Mark Hegarty
24				

<p>1 in my copy -- it's the table that says 2 "Association between family history and 3 lifestyle factors and ovarian cancer risk 4 by endometriosis status." 5 Do you see that table? 6 A. Yes. 7 Q. In that table, as to talc 8 and endometriosis, the authors did an 9 interaction test and found no 10 statistically significant interaction; 11 correct? 12 A. I'm looking at -- yes, 13 that's correct. 14 Q. That means that -- 15 MS. O'DELL: Excuse me, 16 Mark. I don't know that she was 17 finished. 18 MR. HEGARTY: Okay. I'm 19 sorry. 20 MS. O'DELL: If you were, 21 Doctor, you know, fine, but I 22 thought you weren't finished. 23 THE WITNESS: But the 24 numbers are different. The cases</p>	<p>Page 154</p> <p>1 Q. Do you mention anywhere in 2 your report that the Phung authors found 3 no statistically significant interaction 4 between talcum powder use and 5 endometriosis? 6 A. No. What my report states 7 is that it -- that paper, the OCAC group, 8 demonstrated a greater increased risk of 9 ovarian cancer with genital talc use and 10 endometriosis versus those without. It 11 doesn't say statistically significant. 12 Q. Why isn't the reader of your 13 report entitled to know that the authors 14 found no statistically significant 15 interaction between talcum powder use and 16 endometriosis? 17 MS. O'DELL: Objection to 18 the form. 19 THE WITNESS: That was not 20 the point of putting -- putting 21 this in. The point of putting it 22 in was, it was another group, this 23 well-established, respected group 24 of authors, who accept that talcum</p>
<p>1 and controls without endometriosis 2 who -- in the patients who had 3 genital talc use, odds ratio was 4 1.12 and for those with 5 endometriosis, it was 1.38. 6 BY MR. HEGARTY: 7 Q. So with regard to looking at 8 statistical significance between those 9 two odds ratios, statistically, there was 10 no difference; correct? 11 A. It was .2, which they did 12 not consider statistically significant, 13 but the interaction between those two was 14 more than any of the other risk factors. 15 Q. Not finding statistical 16 significance means that the authors could 17 not reject the null hypothesis of no 18 interaction; correct? 19 MS. O'DELL: Object to the 20 form. 21 THE WITNESS: Based on the 22 statistics they used, that's 23 correct. 24 BY MR. HEGARTY:</p>	<p>Page 155</p> <p>1 powder use is a risk for ovarian 2 cancer and that both endometriosis 3 and talcum powder can cause 4 inflammation; and that 5 inflammation can cause ovarian 6 cancer, chronic inflammation can 7 cause ovarian cancer. 8 I didn't feel that it was 9 important to add the statistically 10 significant difference or the P 11 value. Just it was that two 12 inflammatory processes increase 13 the risk more than one. 14 BY MR. HEGARTY: 15 Q. Please look back again at 16 table number 2. With regard to talc use, 17 it reports odds ratios below 1 for 18 nongenital talc use with and without 19 endometriosis. 20 Do you see that? 21 A. I do. 22 Q. Does that mean that using 23 nongenital talc protects or reduces the 24 risk against ovarian cancer in patients</p>

<p>1 analysis of the risk of ovarian cancer 2 with genital talcum powder use in African 3 -- in the African-American women studied, 4 as it relates to all subtypes, they 5 cannot reject the null hypothesis of no 6 significant difference in risk; correct? 7 A. Not -- 8 MS. O'DELL: Excuse me, 9 Mark. Would you mind repeating 10 your question? 11 MR. HEGARTY: Sure. 12 BY MR. HEGARTY: 13 Q. As this study relates to the 14 African-American women studied and for 15 all subtypes, they could not reject the 16 null hypothesis of no significant 17 difference in risk between talc users and 18 non-talc users; correct? 19 MS. O'DELL: Objection to 20 the form. Are you talking about 21 all participants or are you 22 talking about African-American 23 participants?</p>	<p>Page 170</p> <p>1 the null hypothesis because the 2 confidence interval crosses 1, that means 3 the finding could be due to chance; 4 correct? 5 MS. O'DELL: Object to the 6 form. 7 THE WITNESS: So that -- 8 that could have -- that could 9 happen, but this number is 10 consistent with all the other 11 numbers in many of the other 12 studies which are statistically 13 significant. 14 BY MR. HEGARTY: 15 Q. This study -- I'm sorry. Go 16 ahead. 17 A. And I -- and I would -- and 18 I would argue does include mucinous 19 tumors, which are not thought to be the 20 same pathologic disease as serous cancers 21 and endometrioid and clear cell, and so 22 would generally not be thought to be 23 related to the same risk factors.</p>
<p>24 MR. HEGARTY: My question, I 1 believe, was limited to 2 African-American women. 3 MS. O'DELL: It wasn't clear 4 to me. Okay. Thank you. 5 THE WITNESS: So in 6 African-American women, the odds 7 ratios for all-comers was 1.22. 8 The confidence interval did cross 9 1, 0.97 to 1.53. 10 When I'm looking at the 11 paper, table 2, the number of 12 patients, 402, had high-grade 13 serous cancers and then there was 14 22 with low grade, 51 with 15 endometrioid, 23 with clear cell, 16 40 with mucinous, and 80 with 17 others. 18 And so to look at them 19 individually, they can't, and when 20 they specifically just looked at 21 serous, it was statistically 22 significant. 23 BY MR. HEGARTY: 24 Q. When a study cannot reject</p>	<p>Page 171</p> <p>1 table 2 that the study looked at 2 histotypes of ovarian cancer in 3 African-American women besides high-grade 4 serous; correct? 5 A. Yes. 6 Q. And in particular, it lists 7 in table 2 that they looked at patients 8 with low-grade serous, endometrioid, 9 clear cell, mucinous, and other types of 10 ovarian cancer; correct? 11 A. Yes. 12 Q. And with regard to the other 13 histotypes that -- besides high-grade 14 serous, the authors -- what did the 15 authors find in terms of the relative 16 risk or odds ratio? 17 A. They didn't specifically 18 look at them individually because the 19 numbers are small; and as I mentioned, 20 for mucinous tumors, it's thought to be a 21 different pathway with different set of 22 risk factors. It's treated differently. 23 Q. Well, if we look over at -- 24 well, strike that.</p>

1

2 **CERTIFICATE**

5 I, Kimberly A. Cahill, a
6 Federally Approved Registered Merit
7 Reporter, Certified Court Reporter and
8 Notary Public, do hereby certify that
9 prior to the commencement of the
examination, the witness was, duly
remotely sworn by me to testify to the
truth, the whole truth and nothing but
the truth.

10 I DO FURTHER CERTIFY that
11 the foregoing is a verbatim transcript of
12 the testimony as taken stenographically
13 by me at the time, place and on the date
hereinbefore set forth, to the best of my
ability.

I DO FURTHER CERTIFY that I
14 am neither a relative nor employee nor
15 attorney nor counsel of any of the
16 parties to this action, and that I am
17 neither a relative nor employee of such
attorney or counsel, and that I am not
financially interested in the action.

19 KIMBERLY A. CAHILL, a
20 Federally Approved Registered
21 Merit Reporter
22 Notary Public
Dated: January 13, 2024

INSTRUCTIONS TO WITNESS

3 Please read your deposition
4 over carefully and make any necessary
5 corrections. You should state the reason
6 in the appropriate space on the errata
7 sheet for any corrections that are made.

8 After doing so, please sign
9 the errata sheet and date it.

10 You are signing same subject
11 to the changes you have noted on the
12 errata sheet, which will be attached to
13 your deposition.

14 It is imperative that you
15 return the original errata sheet to the
16 deposing attorney within thirty (30) days
17 of receipt of the deposition transcript
18 by you. If you fail to do so, the
19 deposition transcript may be deemed to be
20 accurate and may be used in court.

2 ERRA
3 PAGE LINE CHANGE

10	_____	_____	_____
11	_____	_____	_____
12	_____	_____	_____
13	_____	_____	_____
14	_____	_____	_____
15	_____	_____	_____
16	_____	_____	_____
17	_____	_____	_____
18	_____	_____	_____
19	_____	_____	_____
20	_____	_____	_____
21	_____	_____	_____
22	_____	_____	_____
23	_____	_____	_____
24	_____	_____	_____

ACKNOWLEDGMENT OF DEPONENT

4 I, _____, do
5 hereby certify that I have read the
6 foregoing pages, 1 - 294, and that the
7 same is a correct transcription of the
8 answers given by me to the questions
9 therein propounded, except for the
10 corrections or changes in form or
11 substance, if any, noted in the attached
12 Errata Sheet.

¹⁶ JUDITH KAY WOLF, M.D. DATE

19 Subscribed and sworn
20 to before me this day of , 20

²¹ My commission expires: _____

22

23 Notary Public